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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

9 ST LIBERTY LLC

10 Plaintiff,

11 v.

12 M/V R AN R, USCG Official No. 1069265,
13 her engines, boilers, tackles and other
14 appurtenances, etc., *in rem*; and Robert W,
15 Russell, *in personam*,

16 Defendants.

Civil Action No. 2:20-cv-00343-BJR

**STIPULATION AND ORDER FOR
RELEASE OF VESSEL**

17 **STIPULATION**

18 Pursuant to this Court's Order Authorizing Issuance of Warrant for Arrest of Vessel In Rem
19 dated March 3, 2020, Dkt. No. 8, the U.S. Marshal arrested the defendant vessel M/V R AN R (the
20 "Vessel") on March 10, 2020. Dkt. No. 13.

21 Plaintiff ST Liberty LLC ("STL") and Defendants M/V R AN R and Robert W. Russell
22 (collectively the "Russells"), by and through their attorneys, now stipulate pursuant to
23 Supplemental Rule E(5)(c) that the Vessel should be released from the custody of the U.S. Marshal
24 pursuant to the terms and conditions specified below:
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26

27 **STIPULATION AND ORDER FOR RELEASE OF
VESSEL**
CASE NO. 2:20-CV-00343-BJR - 1

COLLIER WALSH NAKAZAWA LLP
2211 Elliott Avenue, Suite 200
Seattle, Washington 98121
(206) 502 4251

1 1. Unless otherwise agreed in writing by Plaintiff ST Liberty LLC, defendant Robert
2 Russell and his wife Sonja Russell are prohibited from removing, or allowing anyone else to
3 remove, the defendant Vessel from the waters of the State of Washington until all amounts due
4 under the note and mortgage, as amended, are paid in full and all settlement terms are satisfied; and

5 2. All known costs and charges of the Court have been paid in full.

6 Upon acceptance and approval of this Stipulation by the Court, the U.S. Marshal shall
7 release the Vessel from arrest pursuant to Supplemental Rule E(5)(c). Fed. R. Civ. P. Sup. R.
8 E(5)(c).
9

10 IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

11
12 DATED this 13th day of August 2020

COLLIER WALSH NAKAZAWA LLP

13
14 /s/ Barbara L. Holland

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**STIPULATION AND ORDER FOR RELEASE OF
VESSEL**
CASE NO. 2:20-CV-00343-BJR - 2

COLLIER WALSH NAKAZAWA LLP
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(206) 502 4251

1 DATED this 13th day of August 2020

BUCHALTER

2 /s/ John Crosetto

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8 ROBERT W. RUSSELL

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**STIPULATION AND ORDER FOR RELEASE OF
VESSEL**
CASE NO. 2:20-CV-00343-BJR - 3

COLLIER WALSH NAKAZAWA LLP
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ORDER

This matter having come on regularly for consideration before the Court upon the above and foregoing Stipulation, and the Court being fully advised of the matter, it is hereby ORDERED:

1. The U.S. Marshal shall release the Vessel from custody; and
2. Unless otherwise agreed in writing by Plaintiff ST Liberty LLC, defendant Robert Russell and his wife Sonja Russell are prohibited from removing, or allowing anyone else to remove, the defendant Vessel from the waters of the State of Washington until all amounts due under the note and mortgage, as amended, are paid in full and all settlement terms are satisfied.

DATED this 14th day of August, 2020.



The Honorable Barbara J. Rothstein
United States District Judge